

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE and SALLY ROE (pseudonyms))

Plaintiffs,)

v.)

COUNTY OF WESTCHESTER;)

GEORGE LATIMER, Chief Executive of the)
County of Westchester, in his official capacity;)

COUNTY OF WESTCHESTER COUNTY)
DEPARTMENT OF PUBLIC SAFETY;)

TERRANCE RAYNOR, acting Commissioner of)
the Westchester Department of Public Safety, in)
his official capacity;)

NEW ROCHELLE POLICE DEPARTMENT;)

CITY OF WHITE PLAINS DEPARTMENT)
OF PUBLIC SAFETY,)

Defendants)

Case No. 7:22-cv-6950

**UNSWORN DECLARATION OF PLAINTIFFS' COUNSEL
AUTHENTICATING EXHIBITS**

Pursuant to 28 U.S.C. § 1746, Plaintiffs' counsel, Christopher A. Ferrara, hereby declares under penalty of perjury as follows:

1. **EXHIBIT A** is a true copy of a photo of a Planned Parenthood facility and adjacent public sidewalk in Westchester County where Plaintiff Jane Doe exercised her First Amendment-protected pro-life activism prior to the enactment of Chapter 425.

2. **EXHIBIT B** is a true copy of Samples of the literature employed by Plaintiff JANE DOE.
3. **EXHIBIT C** is a true copy of photos of a Planned Parenthood facility, adjacent public sidewalk, and right-of-way crossing driveway in Westchester County where Plaintiff Sally Roe exercised her First Amendment-protected pro-life activism prior to the enactment of Chapter 425.
4. **EXHIBIT D** is a true copy of Samples of literature used by Plaintiff Sally Roe
5. **EXHIBIT E** is a true copy of Pro-Life Signs used by Plaintiff Sally Roe
6. **EXHIBIT F** is a true copy of Board of Legislators Meeting Agenda Packet 2022-06-27, relevant pages 1-10 and 22-41.
7. **EXHIBITS G and H** are true copies of Google Maps aerial views modified for reference purposes as indicated in the Verified Complaint, along with true copies of Google Maps Street view of subject premises.
8. **EXHIBIT I** is a true copy of Press Release by Legislator Smith
9. **EXHIBIT J** is a true copy of Board of Legislators Meeting Agenda Packet 2022-05-09, relevant pages 1-10 and 238-252.
10. **EXHIBIT K** is a true copy of Board of Legislators Meeting Agenda Packet 2022-05-23, relevant pages 1-11 and 460-474.
11. **EXHIBIT L** is a true copy of Legislative Committee Meeting Agenda Packet 2022-06-01
12. **EXHIBIT M** is a true copy of Legislative Committee Meeting Agenda Packet 2022-06-06

13. The quotations employed in the legislative history section of the Verified Complaint are verbatim transcriptions by legal staff of pertinent portions of statements by Legislators, their legal counsel, and invited legal advisors, based upon the video recordings of said public meetings at the hyperlinks cited, which do not appear to be downloadable.
14. I certify under penalty of perjury that the foregoing is true and correct.



CHRISTOPHER A. FERRARA, ESQ.
Special Counsel
THOMAS MORE SOCIETY
148-29 Cross Island Parkway
Whitestone, Queens, New York 11357
Telephone: (718) 357-1040
cferrara@thomasmoresociety.org
Counsel for Plaintiffs